Case 23-01092-MBK Doc

**United States Bankruptcy Court District Of New Jersey** 

Caption In Compliance With D.N.J. LBR 9004-1

**Duane Morris LLP** 

A Delaware Limited Liability Partnership

Sommer L. Ross, Esquire 1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: (856) 874-4200

Facsimile: (856) 424-4446

Email: SLRoss@duanemorris.com

and

Philip R. Matthews, Esquire

(Pro Hac Vice Admission Pending)

Spear Tower

One Market Plaza, Suite 2200 San Francisco, CA 94105-1127

Telephone: (415) 957-3174 Facsimile: (415) 520-6933

E-mail: PRMatthews@duanemorris.com

Counsel for Republic Indemnity Company of

America

Chapter 11 In Re:

Case No. 23-12825 LTL Management LLC,

> Debtor. Judge: Michael B. Kaplan

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that Duane Morris LLP ("Duane Morris") hereby appears in the above-captioned case as counsel for **Republic Indemnity Company of America** ("Republic") and requests, pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b), that copies of all notices, documents and pleadings given or filed in the above-captioned case be given Case 23-01092-MBK Doc Filed 04/18/23 Entered 04/18/23 14:30:15 Desc Main Document Page 2 of 3

and served upon:

Philip R. Matthews, Esquire
Duane Morris LLP
Spear Tower
One Market Plaza, Suite 2200
San Francisco, CA 94105-1127
Telephone: (415) 957-3174
Facsimile: (415) 520-6933

Email: PRMatthews@duanemorris.com

Sommer L. Ross, Esquire Duane Morris LLP 1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: (856) 874-4200 Facsimile: (856) 424-4446

Email: SLRoss@duanemorris.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Republic's: (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Republic is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

## **DOCUMENTS:**

- X All notices entered pursuant to Fed. R. Bankr. P. 2002.
- $\underline{X}$  All documents and pleadings of any nature, including claim objections.

Respectfully submitted,

Duane Morris LLP A Delaware Limited Liability Company

Dated: April 18, 2023

/s/ Sommer L. Ross

Sommer L. Ross, Esquire (NJ Bar # 004112005) 1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: (856) 874-4200 Facsimile: (856) 424-4446

Email: SLRoss@duanemorris.com

## and

Philip R. Matthews, Esquire (*Pro Hac Vice* Application Pending) Spear Tower
One Market Plaza, Suite 2200
San Francisco, CA 94105-1127
Telephone: (415) 957-3174
Facsimile: (415) 520-6933

Email: PRMatthews@duanemorris.com

Counsel for Republic Indemnity Company of America